The Commonwealth of Massachusetts
Office of
Campaign & Political Finance
One Ashburton Place, Boston 02108
727-8352

Dennis J. Duffin
Director

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AO-88-01

Brian Martin
Lowell City Council
137 Fairmount Street
Lowell, MA 01852

Dear Mr. Martin:

This letter is in response to your recent request for an advisory opinion concerning the expenditure of funds by your political committee on behalf of the Dukakis for President campaign. Specifically you mentioned that you would like your committee to pay for airline tickets or hotel rooms in order for you to work at one of the headquarters on "Super Tuesday".

Section 6 of M.G.L. c.55 states, in pertinent part, "[a]ny... political committee may ... expend money ... for the the enhancment of the political future of the candidate ... for which the committee was organized so long as such expenditure is not primarily for the candidate's or any other person's personal use ... provided, further, that the aggregate of all such contributions made by such a committee organized on behalf of candidate to another non-elected political committee organized on behalf of a candidate shall not exceed in any one calendar year the sum of one hundred dollars..."

It is the opinion of this office that payment of expenses by your committee which would inure to the benefit of the Dukakis Committee would not necessarily enhance your political future. Your committee, however, may expend up to $100 on behalf of the Dukakis for President campaign. This expenditure may be a direct contribution to the Dukakis Committee or an in-kind contribution of payment for airline tickets or hotel rooms for yourself.

This opinion does not address the expenditure of personal funds by you nor the applicability of federal campaign finance law to expenditures on behalf of the Dukakis Committee.

This opinion is limited to the facts presented, as to which we have undertaken no independent investigation.

Should you wish additional information please do not hesitate to contact this office.

Very truly yours,

Dennis J. Duffin
Director